

[DATE]

**VIA CERTIFIED MAIL (NUMBER \_\_\_\_\_ )  
RETURN RECEIPT REQUESTED**

Mr. Ron Potter  
Parker Drilling Company  
1401 Enclave Parkway, Suite 600  
Houston, Texas 77077

Mr. John R. Eldridge  
Haynes and Boone, LLP  
1000 Louisiana Street, Suite 4300  
Houston, Texas 77002-5012

Re: Gulfco Marine Maintenance Superfund Site  
Freeport, Brazoria County, Texas

Dear Mr. Potter:

Pursuant to Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA," also known as "Superfund") as amended, 42 U.S.C. § 9606(a), Parker Drilling Company is ordered to perform the actions as explained in the enclosed Amended Unilateral Administrative Order ("Amended UAO") for the Gulfco Marine Maintenance Site ("Gulfco Site").

Based on available information, included as Enclosure C, the Environmental Protection Agency ("EPA") has determined that Parker Drilling Company is liable as a successor to Hercules Offshore Corporation, a former owner/operator of the Gulfco Site.

On July 14, 2005, the EPA issued the Unilateral Administrative Order ("UAO") to the parties listed in Enclosure A. As a result, the parties complying with the UAO have formed a group (the "Gulfco Restoration Group") to address the required actions. The EPA encourages you to coordinate with the Gulfco Restoration Group in addressing this action. The lead contact for the Gulfco Restoration Group is as follows:

Mr. James C. Morriss III  
Thompson & Knight LLP  
1900 San Jacinto Center  
98 San Jacinto Boulevard  
Austin, Texas 78701-4081

Questions concerning legal issues should be directed to:

Ms. Barbara Nann  
U.S. Environmental Protection Agency, Region 6  
Office of Regional Counsel (6RC-S)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Telephone Number: (214) 665-2157  
Fax Number: (214) 665-6460  
E-Mail Address: [nann.barbara@epa.gov](mailto:nann.barbara@epa.gov)

Questions concerning technical aspects should be directed to:

Mr. M. Gary Miller  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-RA)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Telephone Number: (214) 665-8318  
Fax Number: (214) 665-6660  
E-Mail Address: [miller.garyg@epa.gov](mailto:miller.garyg@epa.gov)

Sincerely yours,

Samuel Coleman, P.E.  
Director  
Superfund Division

Enclosures

6SF-RA: Miller-Garyg: x8318:9/5/07:L:\SuperFund\Special Notice\Gulfco RI-FS UAO Parker 9-5-07

6SF-TE  
Aldridge

6RC-S  
Nann

6SF-AP  
Chavarria

6SF-TE  
Johnson

6RC-S  
Peycke

6SF-A  
Hepola

6SF  
Phillips

cc: Ms. Luda Voskov (Project Manager)  
Environmental Cleanup II (MC-143)  
Texas Commission on Environmental Quality (with enclosure)

Mr. Mark Vickery (Deputy Director)  
Office of Permitting, Remediation and Registration  
Texas Commission on Environmental Quality (without enclosure)

Respondents (Enclosure A)

**ENCLOSURE A**

**LIST OF RESPONDENTS**

## **GULFCO MARINE MAINTENANCE SUPERFUND SITE**

1. **Dow Chemical Company**

CT Corporation System  
Registered Agent for  
Dow Chemical Company  
350 N. St. Paul St., Suite 2400  
Dallas, TX 75201

Dow Chemical Company  
3020 Dow Center  
Midland, MI 48674

2. **Mr. Ronald W. Hudson**

34 Green Slope Place  
The Woodlands, TX 77381

3. **LDL Coastal Limited L.P.**

LDL Coastal Limited L.P.  
906 Marlin Dr., CR 756  
Freeport, TX 77541

LDL Management, LLC  
906 Marlin Dr., CR 756  
Freeport, TX 77541

4. **Mr. Jack Palmer**

1509 Alta Vista  
Alvin, TX 77511

5. **Parker Drilling Company**

Corporation Service Company, Registered Agent  
for Hercules Offshore Corporation  
c/o Parker Drilling Company  
800 Brazos  
Austin, TX 78701

6. **Sequa Corporation**

Chromalloy American Corporation  
c/o Sequa Corporation  
111 Eighth Avenue  
New York, NY 10019

CT Corp. System, Registered Agent  
for Sequa Corporation  
350 No. St. Paul St.  
Dallas, TX 75201

**ENCLOSURE B**

**UNILATERAL ADMINISTRATIVE ORDER AND  
STATEMENT OF WORK**

**GULFCO MARINE MAINTENANCE  
SUPERFUND SITE**

**ENCLOSURE C**

**EVIDENCE OF LIABILITY**

**GULFCO MARINE MAINTENANCE  
SUPERFUND SITE**